

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALEXANDER CLIFFORD, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

STATUS RESEARCH &
DEVELOPMENT GMBH, JARRAD
HOPE, and CARL BENNETTS,

Defendants.

Case No. 1:20-cv-02815-NRB

JOINT STIPULATION AND
[PROPOSED] ORDER
REGARDING THE FILING OF
THE FIRST AMENDED
COMPLAINT AND THE SECOND
AMENDED COMPLAINT

Lead Plaintiff Joel Deutsch (“Plaintiff”), individually and on behalf of all others similarly situated, and Defendant Status Research & Development GmbH (“Status,” and with Plaintiff, the “Parties”), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on April 3, 2020, Plaintiff Alexander Clifford filed a class action complaint against Defendants Status, Jarrad Hope, and Carl Bennetts (the “Complaint”) (ECF No. 1), bringing claims under Sections 5 and 12(a)(1) of the Securities Act of 1933 (the “Securities Act”) and the Illinois Securities Law of 1953;

WHEREAS, on June 8, 2020, Joel Deutsch moved for appointment as Lead Plaintiff and approval of selection of Roche Cyrulnik Freedman LLP and Selendy & Gay PLLC as Co-Lead Counsel (ECF Nos. 20–23);

WHEREAS, on June 9, 2020, the Court so-ordered a stipulated schedule whereby the Court-appointed Lead Plaintiff may file an amended class action

complaint within 60 days after the entry of the Court's order appointing Lead Plaintiff and approving lead counsel (ECF No. 25);

WHEREAS, on July 2, 2020, Plaintiff submitted a letter to the Court requesting a pre-motion conference concerning an anticipated motion to substitute Joel Deutsch as plaintiff, to update the caption accordingly, and to file a Proposed Amended Complaint to, among other things, assert certain additional state Blue Sky claims (ECF No. 33);

WHEREAS, on July 22, 2020, the Court appointed Joel Deutsch as Lead Plaintiff and designated the law firms Roche Cyrulnik Freedman LLP and Selendy & Gay PLLC as Co-Lead Counsel (ECF No. 39);

WHEREAS, the Parties have conferred, and Status does not oppose Plaintiff Alexander Clifford's motion to substitute Joel Deutsch as plaintiff, to update the caption accordingly, and to file the Proposed Amended Complaint at this time, without limiting Plaintiff's right to file a Second Amended Complaint within 60 days of this Court's July 22, 2020 order appointing Lead Plaintiff and approving Co-Lead Counsel.

IT IS ACCORDINGLY STIPULATED, by and between the undersigned counsel for the Parties, subject to the Court's approval, as follows:

1. Within two business days of the Court so-ordering this Joint Stipulation and [Proposed] Order, Plaintiff may file the "Proposed Amended Complaint" attached as Exhibit 1 to Plaintiff's July 2, 2020 letter to the Court requesting a pre-motion conference (ECF No. 33). This filing shall be without prejudice to Lead Plaintiff Joel


Deutsch's authority to file a second amended complaint within 60 days after the entry of the Court's July 22, 2020 order appointing Lead Plaintiff and approving Co-Lead Counsel, pursuant to the schedule set forth in the Court's order of June 9, 2020 (ECF No. 25).

2. Plaintiff Joel Deutsch shall be substituted as Plaintiff in this action and the case caption shall be amended accordingly.

3. Defendants reserve all rights, including to object to the timeliness and/or relation back of any of Plaintiff's claims.

4. Nothing in this stipulation shall prejudice the right of any party to seek further extensions with the consent of the other parties or from the Court.

Date: New York, NY
July 24, 2020

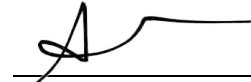


Philippe Z. Selendy
Jordan A. Goldstein
Spencer Gottlieb
David Coon
SELENDY & GAY PLLC
1290 Sixth Avenue, 17th Floor
New York, NY 10104
pselendy@selendygay.com
jgoldstein@selendygay.com
sgottlieb@selendygay.com
dcoon@selendygay.com

Kyle W. Roche
Edward Normand
Velvel (Devin) Freedman
Jordana Haviv
ROCHE CYRULNIK
FREEDMAN LLP
99 Park Avenue, 19th Floor
New York, NY 10016
kyle@rcflp.com
tnormand@rcflp.com
vel@rcflp.com
jhaviv@rcflp.com

Attorneys for Plaintiff

Respectfully submitted,



Tibor L. Nagy, Jr.
Anuja D. Thatte
Michael J. Lockman
DONTZIN NAGY & FLEISSIG LLP
980 Madison Avenue
New York, NY 10075
tibor@dnflp.com
athatte@dnflp.com
mlockman@dnflp.com

*Attorneys for Defendants Status
Research & Development GmbH*

SO ORDERED:

Hon. Naomi Reice Buchwald
United States District Judge

Dated: _____, 2020